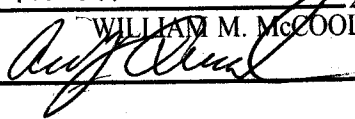


Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

November 28 2018
WILLIAM M. McCOOL, Clerk
By  Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. CHARLES ROLAND CHEATHAM,
a/k/a "Chi-Chi,"
2. LUIS PEREZ-CRUZ,
a/k/a "Vicente Martinez Cruz,"
3. DOMINQUE E. JIMERSON,
a/k/a "Benjamin S. Smith,"
4. DONNIE P. CHEATHAM,
5. TIFFANY LATRICE YOUNGER,
6. LAMONT JEFFREY REYNOLDS,
a/k/a "L,"
7. MICHAEL LAVON DAVIS,
8. NAKITA MARIE CANNADY,
9. EDDRICK JEROME BAKER,
10. ALONZO WILLIAMS BAGGETT,
11. MARTIN JEFFREY BANKS,
12. MARQUS JAMAL JONES,
13. ADAM MICHAEL SMITH,
14. NATHANIEL WELLS,
15. RASHEED CHAFA ECHOLS,
16. MARCUS JAMES HALL,
17. WAUNIKA LYNETTE WALKER,
a/k/a "Granny,"
18. LARRY DOBBIE HOLLOWAY,

No. CR18-131 RAJ

SUPERSEDING INDICTMENT

Superseding Indictment

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UNITED STATES ATTORNEY
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1 19. MICHAEL D. SAFFORD, a/k/a "Sweet,"
2 20. BRANDEN LEI BARNETT, a/k/a "H2O"
3 21. CARLOS DEMARK DENNIS,
4 22. ASA D. HARRIS,
5 23. BRADFORD STREET, and
6 24. JEROME RAY WILSON,
7 25. CARLISA AJA McNEAL

8 Defendants.

9 The Grand Jury charges that:

10 **COUNT 1**

11 **(Conspiracy to Distribute Controlled Substances)**

12 Beginning at a time unknown, but within the past five years, and continuing until
13 on or about June 6, 2018, in King, Snohomish, and Pierce Counties, within the Western
14 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, LUIS
15 PEREZ-CRUZ, DOMINQUE E. JIMERSON, DONNIE P. CHEATHAM, TIFFANY
16 LATRICE YOUNGER, LAMONT JEFFREY REYNOLDS, MICHAEL LAVON
17 DAVIS, NAKITA MARIE CANNADY, EDDRICK JEROME BAKER, ALONZO
18 WILLIAMS BAGGETT, MARTIN JEFFREY BANKS, MARQUS JAMAL JONES,
19 ADAM MICHAEL SMITH, NATHANIEL WELLS, RASHEED CHAFA ECHOLS,
20 MARCUS JAMES HALL, WAUNIKA LYNETTE WALKER, LARRY DOBBIE
21 HOLLOWAY, MICHAEL D. SAFFORD, BRANDEN LEI BARNETT, CARLOS
22 DEMARK DENNIS, ASA D. HARRIS, BRADFORD STREET, JEROME RAY
23 WILSON, CARLISA AJA McNEAL and others known and unknown, including
24 conspirators charged in a separate superseding indictment returned on this same day
25 under the caption United States v. Michael Scott Morgan Jr., et al., CR18-132, did
26 knowingly and intentionally conspire to distribute substances controlled under Title 21,
27 United States Code, Section 812, Schedules I and II, including cocaine, heroin,
28 methamphetamine, marijuana, and oxycodone, contrary to the provisions of Title 21,
United States Code.

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Specific Quantity Allegations as to Cocaine

With respect to Defendants CHARLES ROLAND CHEATHAM, LUIS PEREZ-CRUZ, TIFFANY LATRICE YOUNGER, LAMONT JEFFREY REYNOLDS, MICHAEL LAVON DAVIS, MARTIN JEFFREY BANKS, MARCUS JAMES HALL, LARRY DOBBIE HOLLOWAY, MICHAEL D. SAFFORD, and CARLOS DEMARK DENNIS, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved five kilograms or more of a substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

Specific Quantity Allegations as to Cocaine

With respect to Defendants DOMINIQUE E. JIMERSON, EDDRICK JEROME BAKER, DONNIE P. CHEATHAM, ALONZO WILLIAMS BAGGETT, MARQUS JAMAL JONES, ADAM MICHAEL SMITH, BRANDEN LEI BARNETT, BRADFORD STREET, and JEROME RAY WILSON, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved five hundred grams or more of a substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

Specific Quantity Allegations as to Heroin

With respect to Defendants CHARLES ROLAND CHEATHAM, MICHAEL LAVON DAVIS, NAKITA MARIE CANNADY, NATHANIEL WELLS, RASHEED CHAFA ECHOLS, MARCUS JAMES HALL, WAUNIKA LYNETTE WALKER and CARLISA AJA McNEAL, their conduct as a member of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

Specific Quantity Allegations as to Methamphetamine

With respect to Defendants CHARLES ROLAND CHEATHAM, MICHAEL LAVON DAVIS, and NAKITA MARIE CANNADY, their conduct as a member of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and 846.

COUNT 2

(Possession of Cocaine with Intent to Distribute)

On or about November 4, 2017, in King County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and DOMINQUE E. JIMERSON knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 3

(Possession of Cocaine with Intent to Distribute)

On or about November 8, 2017, in King County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, DONNIE P. CHEATHAM, TIFFANY LATRICE YOUNGER, and LAMONT JEFFREY

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1 REYNOLDS knowingly and intentionally possessed, and did aid and abet the possession
2 of, with intent to distribute, cocaine, a substance controlled under Title 21, United States
3 Code, Section 812.

4 The Grand Jury further alleges that this offense was committed during and in
5 furtherance of the conspiracy charged in Count 1, above.

6 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
7 and Title 18, United States Code, Section 2.

8 **COUNT 4**

9 **(Possession of Cocaine and Heroin with Intent to Distribute)**

10 On or about November 9, 2017, in Pierce County, Washington, in the Western
11 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, MICHAEL
12 LAVON DAVIS, NAKITA MARIE CANNADY, and others known and unknown,
13 knowingly and intentionally possessed, and did aid and abet the possession of, with intent
14 to distribute, cocaine and heroin, substances controlled under Title 21, United States
15 Code, Section 812.

16 The Grand Jury further alleges that this offense involved five kilograms or more of
17 a mixture or substance containing a detectable amount of cocaine, and one kilogram or
18 more of a mixture or substance containing a detectable amount of heroin.

19 The Grand Jury further alleges that this offense was committed during and in
20 furtherance of the conspiracy charged in Count 1, above.

21 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)
22 and Title 18, United States Code, Section 2.

23 **COUNT 5**

24 **(Possession of Cocaine with Intent to Distribute)**

25 On or about November 11, 2017, in Burien, Washington, in the Western District
26 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and EDDRICK
27 JEROME BAKER knowingly and intentionally possessed, and did aid and abet the
28

1 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
2 United States Code, Section 812.

3 The Grand Jury further alleges that this offense was committed during and in
4 furtherance of the conspiracy charged in Count 1, above.

5 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
6 and Title 18, United States Code, Section 2.

7 **COUNT 6**

8 **(Possession of Cocaine with Intent to Distribute)**

9 On or about November 13, 2017, in King County, Washington, in the Western
10 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and
11 ALONZO WILLAMS BAGGETT knowingly and intentionally possessed, and did aid
12 and abet the possession of, with intent to distribute, cocaine, a substance controlled under
13 Title 21, United States Code, Section 812.

14 The Grand Jury further alleges that this offense involved 500 grams or more of a
15 mixture or substance containing cocaine.

16 The Grand Jury further alleges that this offense was committed during and in
17 furtherance of the conspiracy charged in Count 1, above.

18 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
19 and Title 18, United States Code, Section 2.

20 **COUNT 7**

21 **(Possession of Cocaine with Intent to Distribute)**

22 On or about November 21, 2017, in King County, Washington, in the Western
23 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and
24 MARTIN JEFFREY BANKS knowingly and intentionally possessed, and did aid and
25 abet the possession of, with intent to distribute, cocaine, a substance controlled under
26 Title 21, United States Code, Section 812.

27 The Grand Jury further alleges that this offense involved 500 grams or more of a
28 mixture or substance containing cocaine.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
4 and Title 18, United States Code, Section 2.

5 **COUNT 8**

6 **(Possession of Cocaine with Intent to Distribute)**

7 On or about November 27, 2017, in King County, Washington, in the Western
8 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, MARCUS
9 JAMAL JONES, and ADAM MICHAEL SMITH knowingly and intentionally possessed,
10 and did aid and abet the possession of, with intent to distribute, cocaine, a substance
11 controlled under Title 21, United States Code, Section 812.

12 The Grand Jury further alleges that this offense was committed during and in
13 furtherance of the conspiracy charged in Count 1, above.

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
15 and Title 18, United States Code, Section 2.

16 **COUNT 9**

17 **(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)**

18 On or about November 27, 2017, in King County, Washington, within the Western
19 District of Washington, ADAM MICHAEL SMITH, during and in relation to the drug
20 trafficking crimes of *Conspiracy to Distribute Controlled Substances* as charged in Count
21 1 and *Possession of Cocaine with Intent to Distribute* as charged in Count 8, above, did
22 knowingly and intentionally carry, and did aid and abet the carrying of, a firearm, to wit,
23 one Sig Sauer Model P232 .380 semiautomatic pistol, bearing serial number S244271.

24 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

25 **COUNT 10**

26 **(Possession of Cocaine with Intent to Distribute)**

27 On or about November 30, 2017, in Tukwila, Washington, in the Western District
28 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and EDDRICK

1 JEROME BAKER knowingly and intentionally possessed, and did aid and abet the
2 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
3 United States Code, Section 812.

4 The Grand Jury further alleges that this offense was committed during and in
5 furtherance of the conspiracy charged in Count 1, above.

6 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
7 and Title 18, United States Code, Section 2.

8 **COUNT 11**

9 **(Possession of Heroin with Intent to Distribute)**

10 On or about January 7, 2018, at Lewis County, Washington, within the Western
11 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, MICHAEL
12 LAVON DAVIS, NAKITA MARIE CANNADY, and NATHANIEL WELLS
13 knowingly and intentionally possessed, and did aid and abet the possession of, with intent
14 to distribute, heroin, a substance controlled under Title 21, United States Code, Section
15 812.

16 The Grand Jury further alleges that this offense involved one (1) kilogram or more
17 of a mixture or substance containing heroin.

18 The Grand Jury further alleges that this offense was committed during and in
19 furtherance of the conspiracy charged in Count 1, above.

20 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)
21 and Title 18, United States Code, Section 2.

22 **COUNT 12**

23 **(Possession of Cocaine with Intent to Distribute)**

24 On or about February 15, 2018, in King County, Washington, within the Western
25 District of Washington, and elsewhere, MICHAEL LAVON DAVIS and RASHEED
26 CHAFA ECHOLS knowingly and intentionally possessed, and did aid and abet the
27 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
28 United States Code, Section 812.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
4 and Title 18, United States Code, Section 2.

5 **COUNT 13**

6 **(Possession of Heroin with Intent to Distribute)**

7 On or about February 16, 2018, in Tukwila, Washington, Washington, within the
8 Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM
9 and MARCUS JAMES HALL knowingly and intentionally possessed, and did aid and
10 abet the possession of, with intent to distribute, heroin, a substance controlled under Title
11 21, United States Code, Section 812.

12 The Grand Jury further alleges that this offense was committed during and in
13 furtherance of the conspiracy charged in Count 1, above.

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
15 and Title 18, United States Code, Section 2.

16 **COUNT 14**

17 **(Possession of Heroin with Intent to Distribute)**

18 On or about February 18, 2018, in Seattle, Washington, within the Western
19 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and
20 MARCUS JAMES HALL knowingly and intentionally possessed, and did aid and abet
21 the possession of, with intent to distribute, heroin, a substance controlled under Title 21,
22 United States Code, Section 812.

23 The Grand Jury further alleges that this offense was committed during and in
24 furtherance of the conspiracy charged in Count 1, above.

25 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
26 and Title 18, United States Code, Section 2.

COUNT 15

(Possession of Heroin with Intent to Distribute)

On or about February 19, 2018, in Pierce County, Washington, within the Western District of Washington, and elsewhere, MICHAEL LAVON DAVIS and WAUNIKA LYNETTE WALKER knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, heroin, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense involved one kilogram or more of a mixture or substance containing a detectable amount of heroin.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 16

(Possession of Cocaine with Intent to Distribute)

On or about February 20, 2018, in Renton, Washington, within the Western District of Washington, and elsewhere, LARRY DOBBIE HOLLOWAY and others known and unknown, knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 17

(Possession of Cocaine and Heroin with Intent to Distribute)

On or about February 20, 2018, in Pierce County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and

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1 ALONZO WILLAMS BAGGETT knowingly and intentionally possessed, and did aid
2 and abet the possession of, with intent to distribute, cocaine and heroin, substances
3 controlled under Title 21, United States Code, Section 812.

4 The Grand Jury further alleges that this offense involved 100 grams or more of a
5 mixture or substance containing heroin.

6 The Grand Jury further alleges that this offense was committed during and in
7 furtherance of the conspiracy charged in Count 1, above.

8 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
9 and Title 18, United States Code, Section 2.

10 **COUNT 18**

11 **(Possession with Intent to Distribute Cocaine)**

12 On or about February 22, 2018, in Pierce County, Washington, within the Western
13 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and
14 MARCUS JAMES HALL knowingly and intentionally possessed, and did aid and abet
15 the possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
16 United States Code, Section 812.

17 The Grand Jury further alleges that this offense was committed during and in
18 furtherance of the conspiracy charged in Count 1, above.

19 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
20 and Title 18, United States Code, Section 2.

21 **COUNT 19**

22 **(Possession of Cocaine with Intent to Distribute)**

23 On or about February 22, 2018, in King County, Washington, in the Western
24 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, TIFFANY
25 YOUNGER, and MICHAEL D. SAFFORD knowingly and intentionally possessed, and
26 did aid and abet the possession of, with intent to distribute, cocaine, a substance
27 controlled under Title 21, United States Code, Section 812.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
4 and Title 18, United States Code, Section 2.

5 **COUNT 20**

6 **(Possession of Cocaine with Intent to Distribute)**

7 On or about February 23, 2018, in Tukwila, Washington, in the Western District
8 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, BRANDEN LEI
9 BARNETT and LAMONT JEFFREY REYNOLDS knowingly and intentionally
10 possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a
11 substance controlled under Title 21, United States Code, Section 812.

12 The Grand Jury further alleges that this offense was committed during and in
13 furtherance of the conspiracy charged in Count 1, above.

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
15 and Title 18, United States Code, Section 2.

16 **COUNT 21**

17 **(Possession of Cocaine with Intent to Distribute)**

18 On or about February 26, 2018, in King County, Washington, within the Western
19 District of Washington, and elsewhere, MICHAEL LAVON DAVIS and RASHEED
20 CHAFA ECHOLS knowingly and intentionally possessed, and did aid and abet the
21 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
22 United States Code, Section 812.

23 The Grand Jury further alleges that this offense was committed during and in
24 furtherance of the conspiracy charged in Count 1, above.

25 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
26 and Title 18, United States Code, Section 2.

COUNT 22

(Possession of Cocaine with Intent to Distribute)

On or about February 27, 2018, in Seattle, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and others known and unknown, knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 23

(Possession of Cocaine with Intent to Distribute)

On or about February 28, 2018, in King County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and CARLOS DEMARK DENNIS knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 24

(Possession of Heroin with Intent to Distribute)

On or about February 28, 2018, in King County, Washington, within the Western District of Washington, and elsewhere, MICHAEL LAVON DAVIS and WAUNIKA LYNETTE WALKER knowingly and intentionally possessed, and did aid and abet the

1 possession of, with intent to distribute, heroin, a substance controlled under Title 21,
2 United States Code, Section 812.

3 The Grand Jury further alleges that this offense involved 100 grams or more of a
4 mixture or substance containing a detectable amount of heroin.

5 The Grand Jury further alleges that this offense was committed during and in
6 furtherance of the conspiracy charged in Count 1, above.

7 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
8 and Title 18, United States Code, Section 2.

9 **COUNT 25**

10 **(Possession of Cocaine with Intent to Distribute)**

11 On or about March 2, 2018, in King County, Washington, in the Western District
12 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and DOMINQUE E.
13 JIMERSON, knowingly and intentionally possessed, and did aid and abet the possession
14 of, with intent to distribute, cocaine, a substance controlled under Title 21, United States
15 Code, Section 812.

16 The Grand Jury further alleges that this offense involved 500 grams or more of a
17 mixture or substance containing cocaine.

18 The Grand Jury further alleges that this offense was committed during and in
19 furtherance of the conspiracy charged in Count 1, above.

20 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
21 and Title 18, United States Code, Section 2.

22 **COUNT 26**

23 **(Possession of Cocaine with Intent to Distribute)**

24 On or about March 2, 2018, in Renton, Washington, within the Western District of
25 Washington, and elsewhere, CHARLES ROLAND CHEATHAM and LARRY DOBBIE
26 HOLLOWAY knowingly and intentionally possessed, and did aid and abet the
27 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
28 United States Code, Section 812.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
4 and Title 18, United States Code, Section 2.

5 **COUNT 27**

6 **(Possession of Heroin with Intent to Distribute)**

7 On or about March 3, 2018, in King County, Washington, within the Western
8 District of Washington, and elsewhere, MICHAEL LAVON DAVIS and ASA D.
9 HARRIS knowingly and intentionally possessed, and did aid and abet the possession of,
10 with intent to distribute, heroin, a substance controlled under Title 21, United States
11 Code, Section 812.

12 The Grand Jury further alleges that this offense was committed during and in
13 furtherance of the conspiracy charged in Count 1, above.

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
15 and Title 18, United States Code, Section 2.

16 **COUNT 28**

17 **(Possession of Cocaine with Intent to Distribute)**

18 On or about March 4, 2018, in King County, Washington, in the Western District
19 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and BRADFORD
20 STREET knowingly and intentionally possessed, and did aid and abet the possession of,
21 with intent to distribute, cocaine, a substance controlled under Title 21, United States
22 Code, Section 812.

23 The Grand Jury further alleges that this offense involved 500 grams or more of a
24 mixture or substance containing cocaine.

25 The Grand Jury further alleges that this offense was committed during and in
26 furtherance of the conspiracy charged in Count 1, above.

27 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
28 and Title 18, United States Code, Section 2.

COUNT 29

(Possession of Cocaine with Intent to Distribute)

On or about March 6, 2018, in Tukwila, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and MARTIN JEFFREY BANKS knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 30

(Possession of Cocaine with Intent to Distribute)

On or about March 8, 2018, in King County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, JEROME RAY WILSON, and MICHAEL D. SAFFORD knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 31

(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)

On or about March 8, 2018, in King County, Washington, within the Western District of Washington, JEROME RAY WILSON, during and in relation to the drug trafficking crimes of *Conspiracy to Distribute Controlled Substances* as charged in Count 1 and *Possession of Cocaine with Intent to Distribute* as charged in Count 30 above, did

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1 knowingly and intentionally carry, and did aid and abet the carrying of, a firearm, to wit,
2 two Ruger SR9C 9mm semiautomatic pistols, bearing serial numbers 366-67744 and
3 336-88308.

4 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

5 **COUNT 32**

6 **(Possession of Cocaine with Intent to Distribute)**

7 On or about March 10, 2018, in King County, Washington, in the Western District
8 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and others known
9 and unknown, knowingly and intentionally possessed, and did aid and abet the possession
10 of, with intent to distribute, cocaine, a substance controlled under Title 21, United States
11 Code, Section 812.

12 The Grand Jury further alleges that this offense was committed during and in
13 furtherance of the conspiracy charged in Count 1, above.

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
15 and Title 18, United States Code, Section 2.

16 **COUNT 33**

17 **(Possession of Cocaine with Intent to Distribute)**

18 On or about March 14, 2018, in King County, Washington, in the Western District
19 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and CARLOS
20 DEMARK DENNIS knowingly and intentionally possessed, and did aid and abet the
21 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
22 United States Code, Section 812.

23 The Grand Jury further alleges that this offense was committed during and in
24 furtherance of the conspiracy charged in Count 1, above.

25 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
26 and Title 18, United States Code, Section 2.

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COUNT 34**(Possession of Controlled Substances with Intent to Distribute)**

On or about June 6, 2018, at Fife, Washington, within the Western District of Washington, CHARLES ROLAND CHEATHAM and LAMONT JEFFREY REYNOLDS knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine base in the form of crack cocaine, cocaine, heroin, and marijuana, all substances controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

The Grand Jury further alleges that this offense involved 28 grams or more of a mixture or substance containing a detectable amount of cocaine base in the form of crack cocaine.

The Grand Jury further alleges that this offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), (C), and (D), and Title 18, United States Code, Section 2.

COUNT 35**(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)**

On or about June 6, 2018, in Fife, Washington, within the Western District of Washington, CHARLES ROLAND CHEATHAM, during and in relation to the drug trafficking crimes of *Conspiracy to Distribute Controlled Substances* as charged in Count 1 and *Possession of Controlled Substances with Intent to Distribute* as charged in Count 34 above, did knowingly and intentionally carry, and did aid and abet the carrying of, a firearm, to wit: one Springfield XD 9mm semiautomatic pistol bearing serial number XD283880.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

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COUNT 36**(Possession of Methamphetamine with Intent to Distribute)**

On or about June 6, 2018, in Mt. Vernon, Washington, within the Western District of Washington, LUIS PEREZ-CRUZ, a/k/a "Vicente Martinez-Cruz," knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, methamphetamine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

The Grand Jury further alleges that this offense involved five grams or more of actual methamphetamine.

All in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 37**(Felon in Possession of a Firearm)**

On or about June 6, 2018, in Seattle, Washington, within the Western District of Washington, DOMINQUE E. JIMERSON, having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit:

- a. *Misrepresenting a Social Security Number*, on or about September 28, 2004, in the United States District Court for the Western District of Washington, case number CR03-534MJP;
- b. *Felon in Possession of a Firearm*, on or about September 28, 2004, in the United States District Court for the Western District of Washington, case number CR03-534MJP;
- c. *Theft in the First Degree*, on or about March 22, 2002, in the King County Superior Court, case number 01-1-06239-1;
- d. *Attempting to Elude a Pursuing Police Vehicle*, on or about March 22, 2002, in the King County Superior Court, case number 01-1-06362-2;

e. *Identity Theft*, on or about May 9, 2002, in the Snohomish County Superior Court, case number 01-1-00526-4;

f. *Forgery* (two counts), on or about May 9, 2002, in the Snohomish County Superior Court, case number 01-1-00526-4;

g. *Violation of the Uniform Controlled Substances Act*, on or about December 17, 1999, in the King County Superior Court, case number 99-1-04651-6;

h. *Conspiracy to Commit Violation of the Uniform Controlled Substances Act*, on or about October 18, 1996, in the King County Superior Court, case number 96-1-06394-7; and

i. *Assault in the Third Degree*, on or about December 15, 1995, in the King County Superior Court, case number 95-1-06094-0;

did knowingly possess, and did aid and abet the possession of, in and affecting interstate and foreign commerce, firearms, to wit: one Sportster semiautomatic, caliber 7.62, bearing serial number S029554; one Zastava Serbia PAP-MA5NP semiautomatic, caliber 5.56, bearing serial number M85-NP008263; and one Ruger SE 9mm semiautomatic pistol bearing serial number 335-53494, each of which had been shipped or transported in interstate or foreign commerce.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT 38

(Possession of Controlled Substances with Intent to Distribute)

On or about June 6, 2018, at Kent, Washington, within the Western District of Washington, CHARLES ROLAND CHEATHAM and TIFFANY YOUNGER knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine and heroin, substances controlled under Title 21, United States Code, Section 812.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 The Grand Jury further alleges that this offense involved 500 grams or more of a
4 mixture or substance containing a detectable amount of cocaine.

5 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
6 and (C), and Title 18, United States Code, Section 2.

7 **COUNT 39**

8 **(Possession of Controlled Substances with Intent to Distribute)**

9 On or about June 6, 2018, at Seattle, Washington, within the Western District of
10 Washington, MICHAEL LAVON DAVIS knowingly and intentionally possessed, and
11 did aid and abet the possession of, with intent to distribute, methamphetamine and heroin,
12 substances controlled under Title 21, United States Code, Section 812.

13 The Grand Jury further alleges that this offense was committed during and in
14 furtherance of the conspiracy charged in Count 1, above.

15 The Grand Jury further alleges that this offense involved five grams or more of
16 actual methamphetamine.

17 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
18 and (C), and Title 18, United States Code, Section 2.

19 **COUNT 40**

20 **(Felon in Possession of a Firearm)**

21 On or about June 6, 2018, in Des Moines, Washington, within the Western District
22 of Washington, MICHAEL LAVON DAVIS, having previously been convicted of crimes
23 punishable by imprisonment for a term exceeding one year, to wit:

24 a. *Possession of a Controlled Substance*, on or about July 29, 2011, in the
25 King County Superior Court, case number 10-C-09326-1;

26 b. *Possession of a Controlled Substance*, on or about July 29, 2011, in the
27 King County Superior Court, case number 09-1-06133-1;
28

c. *Violation of the Uniform Controlled Substances Act*, on or about November 9, 2007, in the King County Superior Court, case number 06-1-10362-5;

d. *Violation of the Uniform Controlled Substances Act*, on or about December 9, 2005, in the King County Superior Court, case number 05-C-04414-1;

e. *Unlawful Possession of a Firearm in the Second Degree*, on or about June 5, 1998, in the King County Superior Court, case number 97-1-09650-9; and

f. *Assault in the Third Degree*, on or about November 26, 1997, in the King County Superior Court, case number 97-8-06111-5;

did knowingly possess, and did aid and abet the possession of, in and affecting interstate and foreign commerce, a firearm, to wit: one Desert Eagle .357 magnum semiautomatic pistol bearing serial number 7421, which had been shipped or transported in interstate or foreign commerce.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT 41

(Possession of Controlled Substances with Intent to Distribute)

On or about June 6, 2018, at Bellevue, Washington, within the Western District of Washington, MICHAEL LAVON DAVIS and CARLISA AJA McNEAL knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, heroin, methamphetamine, and marijuana, all substances controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense involved one kilogram or more of a mixture or substance containing heroin.

The Grand Jury further alleges that this offense involved fifty grams or more of actual methamphetamine.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

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1 All in violation of Title 21, United States Code, Sections 841(a)(1) and
2 841(b)(1)(A) and (D), and Title 18, United States Code, Section 2.

3 **COUNT 42**

4 **(Possession of Cocaine with Intent to Distribute)**

5 On or about June 6, 2018, in Seattle, Washington, within the Western District of
6 Washington, EDDRICK JEROME BAKER, knowingly and intentionally possessed with
7 intent to distribute cocaine, a substance controlled under Title 21, United States Code,
8 Section 812.

9 The Grand Jury further alleges that this offense was committed during and in
10 furtherance of the conspiracy charged in Count 1, above.

11 All in violation of Title 21, United States Code, Sections 841(a)(1) and
12 841(b)(1)(C).

13 **COUNT 43**

14 **(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)**

15 On or about June 6, 2018, in Seattle, Washington, within the Western District of
16 Washington, EDDRICK JEROME BAKER, during and in relation to the drug trafficking
17 crimes of *Conspiracy to Distribute Controlled Substances* as charged in Count 1 and
18 *Possession of Cocaine with Intent to Distribute* as charged in Count 42, above, did
19 knowingly and intentionally carry a firearm, to wit: one Rossi .357 magnum revolver
20 bearing serial number XH206121.

21 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

22 **COUNT 44**

23 **(Felon in Possession of a Firearm)**

24 On or about June 6, 2018, in Seattle, Washington, within the Western District of
25 Washington, EDDRICK JEROME BAKER, having previously been convicted of a crime
26 punishable by imprisonment for a term exceeding one year, to wit: *Violation of the*
27 *Uniform Controlled Substances Act*, on or about May 9, 1997, in the King County
28 Superior Court, case number 96-1-07284-9, did knowingly possess, in and affecting

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1 interstate and foreign commerce a firearm, to wit: one Rossi .357 magnum revolver
2 bearing serial number XH206121, which had been shipped or transported in interstate or
3 foreign commerce.

4 The Grand Jury further alleges that this offense was committed during and in
5 furtherance of the conspiracy charged in Count 1, above.

6 All in violation of Title 18, United States Code, Section 922(g)(1).

7 **COUNT 45**

8 **(Possession of Controlled Substances with Intent to Distribute)**

9 On or about June 6, 2018, in Tumwater, Washington, within the Western District
10 of Washington, ALONZO WILLIAMS BAGGETT, knowingly and intentionally
11 possessed, and did aid and abet the possession of, with intent to distribute, cocaine and
12 heroin, substances controlled under Title 21, United States Code, Section 812.

13 The Grand Jury further alleges that this offense was committed during and in
14 furtherance of the conspiracy charged in Count 1, above.

15 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C),
16 and Title 18, United States Code, Section 2.

17 **COUNT 46**

18 **(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)**

19 On or about June 6, 2018, in Tumwater, Washington, within the Western District
20 of Washington, ALONZO WILLIAMS BAGGETT, during and in relation to the drug
21 trafficking crimes of *Conspiracy to Distribute Controlled Substances* as charged in Count
22 1 and *Possession of Controlled Substances with Intent to Distribute* as charged in Count
23 45, above, did knowingly and intentionally carry, and did aid and abet the carrying of, a
24 firearm, to wit, one Sig Sauer model P220 .45 caliber semiautomatic pistol bearing serial
25 number G232888.

26 All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

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COUNT 47**(Felon in Possession of a Firearm)**

On or about June 6, 2018, in Tumwater, Washington, within the Western District of Washington, ALONZO WILLIAMS BAGGETT, having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit:

- a. *Attempting to Elude a Pursuing Police Vehicle*, on or about March 2, 2007, in the Thurston County Superior Court, case number 06-1-00881-6;
 - b. *Unlawful Possession of a Firearm in the First Degree*, on or about March 2, 2007, in the Thurston County Superior Court, case number 06-1-00881-6;
 - c. *Unlawful Possession of a Controlled Substance with Intent to Deliver*, on or about March 2, 2007, in the Thurston County Superior Court, case number 06-1-00881-6;
 - d. *Violation of the Uniform Controlled Substances Act*, on or about June 17, 2003, in the King County Superior Court, case number 03-8-01030-0;
 - e. *Violation of the Uniform Controlled Substances Act*, on or about December 18, 2002, in the King County Superior Court, case number 02-8-03896-6; and
 - f. *Violation of the Uniform Controlled Substances Act*, on or about December 18, 2002, in the King County Superior Court, case number 02-8-00903-6,
- did knowingly possess, and did aid and abet the possession of, in and affecting interstate and foreign commerce a firearm, to wit: one Sig Sauer model P220 .45 caliber semiautomatic pistol bearing serial number G232888, which had been shipped or transported in interstate or foreign commerce.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

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COUNT 48

(Possession of Cocaine with Intent to Distribute)

On or about June 6, 2018, in Seattle, Washington, within the Western District of Washington, ADAM MICHAEL SMITH knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 49

(Possession of Controlled Substances with Intent to Distribute)

On or about June 6, 2018, in Tacoma, Washington, within the Western District of Washington, MARCUS JAMES HALL knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine base in the form of crack cocaine and heroin, substances controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 50

(Possession of Controlled Substances with Intent to Distribute)

On or about June 6, 2018, in Renton, Washington, within the Western District of Washington, LARRY DOBBIE HOLLOWAY knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, marijuana, a substance controlled under Title 21, United States Code, Section 812.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D),
4 and Title 18, United States Code, Section 2.

5 **COUNT 51**

6 **(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

7 On or about June 6, 2018, in Renton, Washington, within the Western District of
8 Washington, LARRY DOBBIE HOLLOWAY did knowingly possess, and did aid and
9 abet the possession of, firearms, to wit: one Glock Model 26 bearing serial number
10 BELG583; one Smith & Wesson Governor .45 caliber revolver bearing serial number
11 CSU6119; and one Taurus .38 caliber revolver bearing serial number KF34302 all in
12 furtherance of a drug trafficking crime, to wit: *Conspiracy to Distribute Controlled*
13 *Substances* as charged in Count 1 and *Possession of Marijuana with Intent to Distribute*
14 as charged in Count 50, above.

15 All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

16 **COUNT 52**

17 **(Felon in Possession of a Firearm)**

18 On or about June 6, 2018, in Renton, Washington, within the Western District of
19 Washington, LARRY DOBBIE HOLLOWAY, having previously been convicted of
20 crimes punishable by imprisonment for a term exceeding one year, to wit:

- 21 a. *Attempting to Elude a Pursuing Police Vehicle*, on or about October 13,
22 2006, in the King County Superior Court, case number 06-1-04363-1;
23 b. *Unlawful Possession of a Firearm in the Second Degree*, on or about June
24 4, 2004, in the King County Superior Court, case number 01-1-09494-3;
25 c. *Possession of a Controlled Substance*, on or about June 4, 2004, in the King
26 County Superior Court, case number 01-1-09494-3;
27 d. *Attempting to Elude a Pursuing Police Vehicle*, or about August 25, 2000,
28 in the King County Superior Court, case number 99-1-07618-1;

e. *Violation of the Uniform Controlled Substances Act*, or about October 24, 1997, in the King County Superior Court, case number 97-1-05983-2; and

f. *Violation of the Uniform Controlled Substances Act*, or about November 16, 1994, in the King County Superior Court, case number 94-8-05064-0, did knowingly possess, and did aid and abet the possession of, in and affecting interstate and foreign commerce, firearms, to wit: one Glock Model 26 bearing serial number BELG583; one Smith & Wesson Governor .45 caliber revolver bearing serial CSU6119; and one Taurus .38 caliber revolver bearing serial number KF34302, each of which had been shipped or transported in interstate or foreign commerce.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT 53

(Possession of Methamphetamine with Intent to Distribute)

On or about June 6, 2018, in Renton, Washington, within the Western District of Washington, BRANDON LEI BARNETT knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, methamphetamine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense involved five grams or more of actual methamphetamine.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

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COUNT 54

(Felon in Possession of Ammunition)

On or about June 6, 2018, in Renton, Washington, within the Western District of Washington, BRANDON LEI BARNETT, having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit:

a. *Distribution of Crack Cocaine*, on or about May 9, 2008, in the United States District Court for the Western District of Washington, case number CR07-234RSL;

b. *Escape*, on or about July 20, 2012, in the United States District Court for the Western District of Washington, case number CR12-072RSL;

did knowingly possess, and did aid and abet the possession of, in and affecting interstate and foreign commerce, ammunition, to wit: approximately thirteen rounds of "Federal" .40 caliber ammunition, which had been shipped or transported in interstate or foreign commerce.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT 55

(Possession of Cocaine with Intent to Distribute)

On or about June 6, 2018, in Everett, Washington, within the Western District of Washington, CARLOS DEMARK DENNIS, knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that his offense involved 500 grams or more of a mixture or substance containing a detectable amount of cocaine.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

1 All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B),
2 and Title 18, United States Code, Section 2.

3 **COUNT 56**

4 **(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

5 On or about June 6, 2018, in Everett, Washington, within the Western District of
6 Washington, CARLOS DEMARK DENNIS did knowingly possess, and did aid and abet
7 the possession of, a firearm, to wit: one Ruger model LC9 9mm semiautomatic pistol
8 bearing serial number 324-49436, in furtherance of a drug trafficking crime, to wit:
9 *Conspiracy to Distribute Controlled Substances* as charged in Count 1 and *Possession of*
10 *Cocaine with Intent to Distribute* as charged in Count 55, above.

11 All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

12 **COUNT 57**

13 **(Felon in Possession of a Firearm)**

14 On or about June 6, 2018, in Everett, Washington, within the Western District of
15 Washington, CARLOS DEMARK DENNIS, having previously been convicted of crimes
16 punishable by imprisonment for a term exceeding one year, to wit:

- 17 a. *Possession of a Controlled Substance*, on or about January 8, 2016, in the
18 King County Superior Court, case number 15-1-06809-8; and
19 b. *Distribution of Cocaine Base*, on or about February 1, 1998, in the United
20 States District Court for the Western District of Louisiana, case number CR96-
21 20058;

22 did knowingly possess, and did aid and abet the possession of, in and affecting interstate
23 and foreign commerce a firearm, to wit: one Ruger model LC9 9mm semiautomatic pistol
24 bearing serial number 324-49436, which had been shipped or transported in interstate or
25 foreign commerce.

26 The Grand Jury further alleges that this offense was committed during and in
27 furtherance of the conspiracy charged in Count 1, above.

28 All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT 58

(Possession of Controlled Substances with Intent to Distribute)

On or about June 6, 2018, in Seattle, Washington, within the Western District of Washington, BRADFORD STREET, knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, marijuana, and oxycodone, all substances controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C) and (D), and Title 18, United States Code, Section 2.

COUNT 59

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about June 6, 2018, in Seattle, Washington, within the Western District of Washington, BRADFORD STREET did knowingly possess, and did aid and abet the possession of, a firearm, to wit: one Smith and Wesson model SD9 VE 9mm semiautomatic pistol bearing serial number FXK8245, in furtherance of a drug trafficking crime, to wit: *Conspiracy to Distribute Controlled Substances* as charged in Count 1 and *Possession of Controlled Substances with Intent to Distribute* as charged in Count 58, above.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 60

(Felon in Possession of a Firearm)

On or about June 6, 2018, in Seattle, Washington, within the Western District of Washington, BRADFORD STREET, having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit:

- a. *Possession of a Controlled Substance*, on or about November 14, 2012, in the King County Superior Court, case number 12-1-01342-6;

b. *Conspiracy to Commit a Violation of the Uniform Controlled Substances Act*, on or about April 11, 2008, in the King County Superior Court, case number 08-1-00850-5;

c. *Conspiracy to Commit a Violation of the Uniform Controlled Substances Act*, on or about April 4, 1997, in the King County Superior Court, case number 97-1-00069-2;

d. *Violation of the Uniform Controlled Substance Act*, on or about February 12, 1993, in the King County Superior Court, case number 92-1-07619-1;

e. *Possession of a Controlled Substance*, on or about January 18, 1991, in the King County Superior Court, case number 90-1-06579-7; and

f. *Theft in the Second Degree*, on or about August 24, 1988, in the King County Superior Court, case number 88-1-02533-5,

did knowingly possess, and did aid and abet the possession of, in and affecting interstate and foreign commerce a firearm, to wit: one Smith and Wesson model SD9 VE 9mm semiautomatic pistol bearing serial number FXK8245, which had been shipped or transported in interstate or foreign commerce.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT 61

(Possession of Crack Cocaine with Intent to Distribute)

On or about June 6, 2018, in Seattle, Washington, within the Western District of Washington, JEROME RAY WILSON, knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine base in the form of crack cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense involved 28 grams or more of a mixture or substance containing cocaine base in the form of crack cocaine.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B),
4 and Title 18, United States Code, Section 2.

5 **COUNT 62**

6 **(Conspiracy to Commit Money Laundering)**

7 Beginning at a date unknown, but within the last five years, and continuing until
8 on or about June 6, 2018, in the Western District of Washington, and elsewhere,
9 CHARLES ROLAND CHEATHAM, MICHAEL LAVON DAVIS, and others known
10 and unknown, unlawfully and knowingly combined, conspired, confederated and agreed
11 together and with each other to commit certain money laundering offenses under Title 18,
12 United States Code, Section 1956 as follows:

13 **(1956(a)(1))**

14 (1) Did conduct and attempt to conduct financial transactions, that is:
15 transactions involving the movement of funds in interstate commerce, which in fact
16 involved the proceeds of specified unlawful activity, that is, conspiracy to distribute
17 controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1),
18 and 846, knowing that the property involved in the financial transactions represents the
19 proceeds of some form of unlawful activity:

20 (A) with the intent to promote the carrying on of the specified unlawful
21 activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

22 (B) knowing that the transactions are designed in whole or in part –

23 (i) to conceal and disguise the nature, the location, the source,
24 the ownership, and the control of the proceeds of the specified unlawful
25 activity, in violation of Title 18, United States Code, Section
26 1956(a)(1)(B)(i); and
27
28

(ii) to avoid a transaction reporting requirement under State and Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii); and

The Grand Jury further alleges that offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 63

(Money Laundering)

On or about January 7, 2018, at Lewis County, Washington, within the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and MICHAEL LAVON DAVIS did knowingly conduct and attempt to conduct a financial transaction, and did aid and abet others in conducting and attempting to conduct a financial transaction, affecting interstate and foreign commerce, to wit the transportation of United States Currency, from the State of Washington to the State of California, which involved the proceeds of a specified unlawful activity, that is Conspiracy to Distribute Controlled Substances as Charged in Count 1, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, source, ownership and control of the proceeds of said specified unlawful activity, and with the intent to promote the carrying on of specified unlawful activity, to wit: Possession of Controlled Substances as Charged in Count 11, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

The Grand Jury further alleges that offense was committed during and in furtherance of the conspiracies charged in Counts 1 and 63, above.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 2.

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ASSET FORFEITURE ALLEGATION

Counts 1-8, 10-30, 32-34, 36, 38-39, 41-42, 45, 48-50, 53, 55, 58, and 61

The allegations contained in Counts 1-8, 10-30, 32-34, 36, 38-39, 41-42, 45, 48-50, 53, 55, 58, and 61 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Pursuant to Title 21, United States Code, Section 853(a), upon conviction of any of the offenses alleged in Counts 1-8, 10-30, 32-34, 36, 38-39, 41-42, 45, 48-50, 53, 55, 58, and 61 of this Superseding Indictment, the defendants, CHARLES ROLAND CHEATHAM, LUIS PEREZ-CRUZ, DOMINQUE E. JIMERSON, DONNIE P. CHEATHAM, TIFFANY LATRICE YOUNGER, LAMONT JEFFREY REYNOLDS, MICHAEL LAVON DAVIS, NAKITA MARIE CANNADY, EDDRICK JEROME BAKER, ALONZO WILLIAMS BAGGETT, MARTIN JEFFREY BANKS, MARQUS JAMAL JONES, ADAM MICHAEL SMITH, NATHANIEL WELLS, RASHEED CHAFA ECHOLS, MARCUS JAMES HALL, WAUNIKA LYNETTE WALKER, LARRY DOBBIE HOLLOWAY, MICHAEL D. SAFFORD, BRANDEN LEI BARNETT, CARLOS DEMARK DENNIS, ASA D. HARRIS, BRADFORD STREET, JEROME RAY WILSON and CARLISA AJA McNEAL, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of that offense, and also shall forfeit any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, that offense, including but not limited to the following:

- a. Approximately \$305,335 in U.S. currency, seized from Charles Roland Cheatham on or about June 6, 2018, in Seattle, Washington;
- b. Approximately six pieces of assorted jewelry, seized from Charles Roland Cheatham on or about June 6, 2018, in Seattle, Washington;
- c. Approximately \$5,315 in U.S. currency, seized from Dominique E. Jimerson on or about June 6, 2018, in Seattle, Washington;

- d. Approximately \$8,162 U.S. currency, seized from Larry Dobbie Holloway on or about June 6, 2018, in Renton, Washington;
- e. Approximately \$3,600 in U.S. currency, seized from Carlos Demark Dennis, on or about June 6, 2018, in Everett, Washington;
- f. Approximately \$3,623 in U.S. currency, seized from Donnie P. Cheatham on or about June 6, 2018, in Seattle, Washington;
- g. Approximately \$2,575 in U.S. currency, seized from Eddrick Jerome Baker on or about June 6, 2018, in Seattle, Washington;
- h. Approximately \$30,300 in U.S. currency, seized on or about June 6, 2018, from Carlisa Aja McNeal residence in Bellevue, Washington;
- i. Approximately \$8,928 in U.S. currency, seized from Luis Perez-Cruz on or about June 6, 2018, in Mount Vernon, Washington;
- j. Approximately \$28,534 in U.S. currency, seized from Luis Perez-Cruz on or about June 6, 2018, in Mount Vernon, Washington; and
- k. A judgment for a sum of money representing any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of that offense, and any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, that offense.

Counts 9, 31, 35, 37, 40, 43-44, 46-47, 51-52, 54, 56-57, and 59-60

The allegations contained in Counts 9, 31, 35, 37, 40, 43-44, 46-47, 51-52, 54, 56-57, and 59-60 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), upon conviction of any of the offenses charged in Counts 9, 31, 35, 37, 40, 43-44, 46-47, 51-52, 54, 56-57, and 59-60 of this Superseding Indictment, the defendants, CHARLES ROLAND CHEATHAM, DOMINQUE E.

Superseding Indictment

United States v. Cheatham et al. / CR18-131 RAJ - 36

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
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(206) 553-7970

JIMERSON, MICHAEL LA VON DAVIS, EDDRICK JEROME BAKER, ALONZO WILLIAMS BAGGETT, ADAM MICHAEL SMITH, LARRY DOBBIE HOLLOWAY, BRANDEN LEI BARNETT, CARLOS DEMARK DENNIS, BRADFORD STREET, and JEROME RAY WILSON, shall forfeit to the United States any firearms or ammunition involved or used in any knowing violation of Title 18, United States Code, Sections 922(g) or 924, including but not limited to the following:

- a. One Springfield XD 9mm semiautomatic pistol bearing serial number XD283880, seized on or about June 6, 2018, and any associated ammunition;
- b. One Rossi .357 magnum revolver, bearing serial number XH208121, seized on or about June 6, 2018, and any associated ammunition;
- c. One Glock GMBH 27, .40 caliber pistol, bearing serial number BCEM841, seized on or about June 6, 2018, and any associated ammunition;
- d. One Glock GMBH 43, 9mm pistol, bearing serial number ACGV297, seized on or about June 6, 2018, and any associated ammunition;
- e. One Jennings J22, .22 caliber pistol, bearing serial number 229250, seized on or about June 6, 2018, and any associated ammunition; and
- f. One Remington Arms Company, Inc. 870, 12-gauge shotgun, bearing serial number T255876V, seized on or about June 6, 2018, and any associated ammunition.

Counts 62-63

The allegations contained in Counts 62-63 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of any of the offenses charged in Counts 62-63 of this Superseding Indictment, the defendants, CHARLES ROLAND CHEATHAM and MICHAEL LAVON DAVIS, shall forfeit to the United States any and all property, real or personal, involved in the offense, or any property traceable to such property, including but not limited to a judgment for a

Superseding Indictment

United States v. Cheatham et al. / CR18-131 RAJ - 37

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
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1 sum of money representing any property, real or personal, involved in the offense or any
2 property traceable to such property.

3 *Substitute Assets*

4 If any of the above-described forfeitable property, as a result of any act or
5 omission of the defendants,

- 6 a. cannot be located upon the exercise of due diligence;
7 b. has been transferred or sold to, or deposited with, a third party;
8 c. has been placed beyond the jurisdiction of the Court;
9 d. has been substantially diminished in value; or
10 e. has been commingled with other property which cannot be divided without
11 difficulty;

12 ///

13 ///

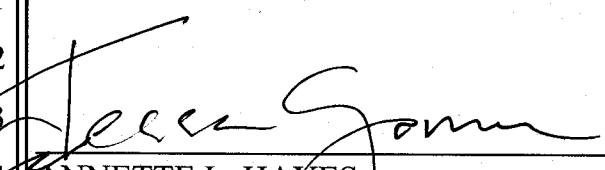
1 it is the intent of the United States, pursuant to Title 18, United States Code, Section
2 982(b), Title 21, United States Code, Section 853(p), and Title 28, United States Code,
3 Section 2461(c), to seek the forfeiture of any other property of the defendants, up to the
4 value of the above-described forfeitable property.

5
6 A TRUE BILL:

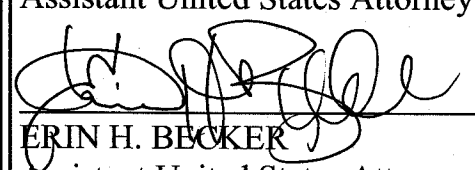
7 DATED: 11-28-2018

8 *Signature of the Foreperson redacted*
9 *pursuant to the policy of the Judicial*
10 *Conference of the United States*

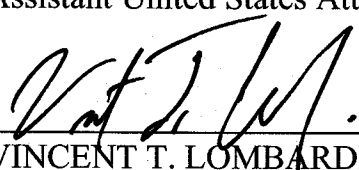
11 FOREPERSON

12
13 
14 ANNETTE L. HAYES
15 United States Attorney

16 
17 SARAH Y. VOGEL
18 Assistant United States Attorney

19 
20 ERIN H. BECKER
21 Assistant United States Attorney

22 
23 NICHOLAS MANHEIM
24 Assistant United States Attorney

25 
26 VINCENT T. LOMBARDI
27 Assistant United States Attorney
28